

JANET M. HEROLD
Regional Solicitor
LEON PASKER (Hawaii State Bar No. 8505)
Senior Trial Attorney
ROSE DARLING (Cal Bar No. 243893)
Trial Attorney
BENJAMIN BOTTS (Cal Bar. No. 274542)
Trial Attorney
NATALIE NARDECCHIA (Cal Bar. No. 246486)
Trial Attorney
UNITED STATES DEPARTMENT OF LABOR
Office of the Solicitor
90 7th Street, Suite 3-700
San Francisco, California 94103
Telephone: (415) 625-7743
Facsimile: (415) 625-7772
email: pasker.leon@dol.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SETH D. HARRIS, Acting Secretary of) Labor, United States Department of) Labor,) Case Number: 12-cv-0116 (WHO/NC)
Plaintiff,)
vs.)
SEAFOOD PEDDLER OF SAN) RAFAEL, INC., dba SEAFOOD) PEDDLER, a corporation; ALPHONSE) SILVESTRI, an individual, RICHARD) MAYFIELD, an individual, and FIDEL) CHACON, an individual,) JOINT STIPULATION RE: DEADLINE FOR FILING DISCOVERY MOTIONS AND CONTINUANCE OF HEARING DATE
Defendants.)

The parties in the above-titled action submit this Joint Stipulation Re:
Deadline for Filing Discovery Motions and Continuance of Hearing Date.

1 WHEREAS, on July 5, 2013, the Court issued an Order Re: Discovery
2 Dispute (Dkt. No. 111);

3 WHEREAS the Court therein directed the parties to file various discovery-
4 related motions and a joint discovery letter by July 17, 2013, and also scheduled
5 dates for filing opposition and reply documents (hereinafter collectively
6 “discovery-related motion documents”);

7 WHEREAS the Court set a hearing date of August 21, 2013 for motions
8 related to said discovery-related motion documents; and

9 WHEREAS, due to various scheduling conflicts of counsel and the parties’
10 ongoing efforts to meet and confer, counsel for all parties require and hereby
11 request additional time to prepare and file the aforementioned discovery-related
12 motions and said joint discovery letter;

13 NOW, THEREFORE, the parties stipulate and agree as follows:

14 1. The parties agree to a one week extension of the deadline to file all the
15 discovery-related motion documents addressed in the Court’s July 5, 2013 Order
16 and that, accordingly, the new deadline for filing the discovery-related motions and
17 joint discovery letter should be July 24, 2013.

18 2. The parties also agree that the hearing date for said discovery-related
19 matters be continued for one week from August 21, 2013 to August 28, 2013.

20 The parties therefore respectfully request that the Court continue the
21 deadline for filing the aforementioned discovery-related documents to July 24,
22 2013. The parties also respectfully request that the Court continue the hearing date
23 for said discovery matters to August 28, 2013.

24 ///

1 AGREED:

2
3 Date: July 15, 2013

/s/ Natalie Nardecchia

4 Natalie Nardecchia
Attorneys for the Plaintiff
5 U.S. DEPARTMENT OF LABOR,
OFFICE OF THE SOLICITOR
6

7 BENJAMIN, WEILL & MAZER
A Professional Corporation
8

9 Date: July 15, 2013

/s/ Marc Mazer

10 Marc S. Mazer
Attorneys for Defendant
11 SEAFOOD PEDDLER OF SAN RAFAEL,
12 INC. dba SEAFOOD PEDDLER
13

14 LAW OFFICES OF MATTANIAH EYTAN

15 Date: July 15, 2013

/s/ Mattaniah Eytan

16 Mattaniah Eytan
Attorneys for Defendants
17 ALPHONSE SILVESTRI, RICHARD
18 MAYFIELD, and FIDEL CHACON
19

20 **ORDER**

21 PURSUANT TO JOINT STIPULATION, IT IS SO ORDERED

22 Dated: July 16, 2013

